

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

Southern District of Ohio

United States of America

v.

Ernesto Venegas

Case No.

2:16-mj-503

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 10-26-2016 in the county of Franklin in the
Southern District of Ohio, the defendant(s) violated:

Code Section

Offense Description

Title 21 USC 841 (b)(1)(C) and 846

Conspiracy to possess with intent to distribute heroin

This criminal complaint is based on these facts:

See attached Affidavit, incorporated by reference herein.

☒ Continued on the attached sheet.


Complainant's signature

Janey Carroll, Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date: 10/27/16


Judge's signature

City and state: Columbus, Ohio

Terence P. Kemp, US Magistrate Judge

Printed name and title

I, Janey Carroll, having been duly sworn depose and state:

1. I am a Special Agent of the Drug Enforcement Administration (DEA), assigned to the Detroit Field Division, Columbus District Office. As such, I am an “investigative or law enforcement officer” of the United States within the meaning of Title 18, United States Code, Section 2510(7), that is, an officer of the United States who is empowered by law to conduct investigations of and to make arrests for offenses enumerated in Title 21 United States Code, Section 878. I have been a Special Agent of the DEA for approximately sixteen years, during which time I have participated in numerous investigations involving narcotics trafficking. I have received specialized training in the subject of narcotics trafficking and money laundering from the DEA and have been personally involved in investigations concerning the possession, manufacture, transportation, distribution and importation of controlled substances, as well as methods used to finance drug transactions. The information set forth in this affidavit comes from my personal involvement in this investigation, as well as information provided to me by other law enforcement officers. This affidavit details part of the investigation, in substance, into a local drug trafficking organization.

2. In or about October 2016 Franklin County Sheriff's Office (FCSO) and DEA began an investigation into the drug trafficking activities of Jorge RODRIGEZ and Ernesto VENEGAS. Agents discovered initially RODRIGUEZ was a source of supply for heroin, as the FCSO attempted to make an undercover heroin purchase with VENEGAS. On October 26, 2016, FCSO Detective James Jodrey, working in an undercover capacity, made arrangements with a Confidential Informant (CI) to purchase one (1) ounce of heroin for the sum of one thousand, six hundred, and fifty dollars (\$1,650) from VENEGAS. Agents then conducted surveillance of VENEGAS which lead to the discovery that RODRIGUEZ was the source of

supply.

3. Agents established surveillance of VENEGAS at 45 South Richardson Avenue, Columbus, Ohio (hereafter Richardson Avenue). Det. Jodrey and the CI placed a consensually monitored call to a male who was traveling with VENEGAS. During the phone call the male informed the CI that he was leaving his residence with VENEGAS to pick up the heroin. The male also informed the CI that they were going to meet VENEGAS' uncle at a residence near Wilson Road. Surveillance units observed the male and VENEGAS exited Richardson Avenue and proceeded to 1285 Deer Lake Court Columbus, Ohio 43204 (hereafter Deer Lake Court). VENEGAS exited the vehicle and entered Deer Lake Court. Deer Lake Court is located off of Wilson Road in Columbus, Ohio.

4. While VENEGAS was inside the Deer Lake Court address, the CI received a consensually monitored call from the male who informed the CI that VENEGAS was inside of a residence getting the heroin. The male informed the CI that he/she would be leaving soon to complete the transaction.

5. Surveillance units followed VENEGAS and the male from the Deer Lake Court Address to the area of the meet location. FCSO Marked units conducted a traffic stop of VENEGAS and the male for traffic violations. No narcotics were located in the vehicle, nor on the subjects. VENEGAS was charged with Ohio Revised Code 2925.03 Trafficking in Drugs, Offer to Sell, and was transported to Franklin County Jail. While VENEGAS was being processed into the jail, Deputies discovered an ounce size ball of suspected heroin wrapped in electrical tape hidden on VENEGAS person.

6. On October 26, 2016, Detective Jodrey applied for and received a State of Ohio search warrant for RODRIGUEZ address on Deer Lake Court. Incident to the search of the

residence agents located approximately 647 gg of heroin, several long guns and handguns, and large amount of US currency. RODRIGUEZ indicated he spoke Spanish and agents contacted Detective John Baer to assist in interpreting. Detective Baer advised RODRIGUEZ of his Constitutional Rights, which he understood and waived. RODRIGUEZ advised the following, in substance, concerning his involvement in illegal narcotics:

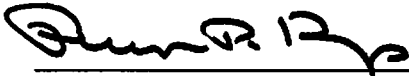
- RODRIGUEZ indicated he has been trafficking in heroin for a few months.
- The two or three bags of heroin or "Dirt" agents located in his residence were fronted to him by a Hispanic male known as "Rojo" or Red LNU.
- On two occasions RODRIGUEZ picked up heroin from Red LNU. On the first occasion he picked up approximately 5 ounces of heroin and on the second occasion he picked up 15 ounces of heroin.
- He advised he sold an ounce of heroin on October 26, 2016, for \$1,400.00, to a Hispanic male known to him as Jr LNU. Jr LNU was supposed to return with the money for the heroin a few hours later, but never returned.
- RODRIGUEZ stated the firearms, heroin, and US currency agents located in his house were his. The US currency was from the sale of narcotics.

7. Based upon this information, your affiant believes probable cause exists that Jorge RODRIGUEZ and Ernesto VENEGAS violated 21 U.S.C. §§ 841(b)(1)(C) and 846, Conspiracy to possess with intent to distribute heroin, a Scheduled I drug.



Janey Carroll
Special Agent
Drug Enforcement Administration

Subscribed and Sworn to before me
this 27th day of October 2016.



Terence P. Kemp
U.S. MAGISTRATE JUDGE